

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In the Bankruptcy Matter of:

Enrique Montano

Debtor

Bankruptcy No. 17-29620
Judge Pamela S. Hollis (Joliet)
Chapter: 13

OBJECTION TO CONFIRMATION

NOW COMES Wells Fargo Bank, N.A., as Trustee, for Park Place Securities, Inc. Asset-Backed Pass-Through Certificates, Series 2005-WCW1 (hereinafter "Creditor"), through its attorney, Kenneth W. Bach of Johnson, Blumberg & Associates, LLC, and states as follows:

1. The above-captioned Chapter 13 case was filed on October 3, 2017.
2. Creditor, a party in interest, holds a Mortgage dated March 24, 2005 on the property located at 690 N Ohio St, Aurora, Illinois 60505, in the original amount of \$219,000.00.
3. The payoff balance due as the filing date of this case is \$276,481.81.
4. Creditor's arrearage claim is \$2,341.68.
5. The Debtor's plan provides that the Chapter 13 Trustee is to pay Creditor \$1,500.00 for its arrearage claim. Said plan does not fully pay Creditor's actual claim and as such, the plan is unfeasible.
6. By not paying the full amount of Creditor's claim, the proposed plan modifies the rights of the Creditor and such modification is inconsistent with the provisions of 11 U.S.C. § 1322(b)(2) and as such, the plan does not comply with the Bankruptcy Code.

WHEREFORE, Wells Fargo Bank, N.A., as Trustee, for Park Place Securities, Inc. Asset-Backed Pass-Through Certificates, Series 2005-WCW1 prays that confirmation of the Debtor's plan be denied and for such other relief as the Court deems just.

/s/ Kenneth W. Bach

Kenneth W. Bach, ARDC #6295816
Attorney for Wells Fargo Bank, N.A., as
Trustee, for Park Place Securities, Inc. Asset-
Backed Pass-Through Certificates, Series 2005-
WCW1

Kenneth W. Bach
Johnson, Blumberg, & Associates, LLC
230 W. Monroe Street, Suite 1125
Chicago, Illinois 60606
Ph. 312-541-9710
Fax 312-541-9711

NOTICE:

THIS LAW FIRM IS ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION
OBTAINED WILL BE USED FOR THAT PURPOSE